

**UNITED STATES DISTRICT
COURT NORTHERN DISTRICT OF
GEORGIA ATLANTA DIVISION**

VOTE.ORG; GEORGIA ALLIANCE FOR
RETIRED AMERICANS; and
PRIORITIES USA,

Plaintiffs,

v.

GEORGIA STATE ELECTION BOARD,
et al.,

Defendants,

GEORGIA REPUBLICAN PARTY, INC.;
and REPUBLICAN NATIONAL
COMMITTEE, et al.,

Intervenor-Defendants.

Case No. 1:22-cv-01734-JPB

JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

COME NOW Plaintiffs, Defendants, and Intervenor-Defendants (collectively the “Parties”) jointly move the Court for the Entry of the attached Stipulated Protective Order and show the Court as follows:

1. The Court opened discovery in this matter on March 9, 2023. (Doc. 59).

The Parties are actively engaged in the discovery process.

2. During the discovery process the Parties discovered that the information

being exchanged in this matter includes highly sensitive information, including but not limited to, Particular Individual Information of voters – (e.g., voters’ birth dates, social security numbers, addresses, telephone numbers, and email addresses).

3. Because of the sensitive nature of the information that is being exchanged, the Parties seek to provide limitations on the disclosure of confidential material exchanged during discovery in this matter.
4. The purpose of the Stipulated Protective Order is to protect against the unauthorized and/or unnecessary disclosure of confidential information.
5. The Parties jointly move this Court pursuant to Federal Rule of Civil Procedure 26(c), which provides that a protective order may issue “for good cause” to protect a person from “annoyance, embarrassment, oppression, or undue burden or expense.”
6. Whether good cause exists is a factual question turning on, *inter alia*, the nature of the information at issue. *Chicago Tribune Co. v. Bridgestone/Firestone, Inc.*, 263 F.3d 1304, 1315 (11th Cir. 2001). An important factor in this calculation is whether an order is necessary to protect legitimate privacy interests. *Romero v. Drummond Co.*, 480 F.3d 1234, 1246 (11th Cir. 2007); *Luzzi v. ATP Tour, Inc.*, No. 3:09-cv-1155,

2011 WL 2693542, at *3 (M.D. Fla. July 12, 2011) (“The Eleventh Circuit has held that legitimate privacy interests are an important factor to be considered.”).

7. The Parties submit that this Stipulated Protective Order is necessary to protect the privacy interest of the voters and to protect their confidential information from being misused.
8. Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the Parties jointly request that the Court issue the Stipulated Protective Order in this matter to protect any confidential information exchanged during discovery.
9. The Parties have prepared a proposed Stipulated Consent Protective Order for the Court’s consideration and attached it hereto as an exhibit to this Motion.
10. The Parties understand that the entry of the accompanying Stipulated Protective Order will not affect the Court’s ability to modify the Order or enter additional protection at any time during the pendency of this litigation.
11. The Parties respectfully move this Court for entry of the Stipulated Protective Order, pursuant to Rule 26(c) of the Federal Rules of Civil

Procedure, to protect the confidentiality of certain information and to facilitate discovery.

Respectfully Submitted this 29th day of June, 2023.

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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that on this day, I presented the Joint Motion to Extend Discovery Deadline in Times New Roman, 14-point type in accordance with L.R. 5.1(C). I further certify that I electronically filed this Joint Motion to Extend Discovery Deadline with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsels of record.

This 29th day of June 2023.

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